

**COMMONWEALTH OF MASSACHUSETTS**  
**Department of Telecommunications and Energy**

**RESPONSE OF THE ATTORNEY GENERAL TO THE  
SECOND SET OF INFORMATION REQUESTS FROM THE  
BAY STATE GAS COMPANY  
DTE 05-27**

Dated: August 2, 2005

Responsible Party: Jon Cavallo

BSG-AG-2-23            Refer to the Cavallo Testimony at 8, line 12. (a) Describe how a pipe buried under the ground can be protected from all corrosive forces. (b) Describe the natural gas distribution industry standard construction techniques for excavating, trenching and burial of natural gas distribution mains and services, and related infrastructure, from (i) 1900-1920, (ii) 1920-1950, (iii) 1950-1970 and (iv) 1970-1980. (c) Has there been a change in the standard techniques used by the natural gas distribution industry since 1980?

Response:        A number of methodologies, used either singly or in combination, are available for protecting buried structures, such as pipe, from corrosion. These methods include the use of corrosion-resistant piping (such as plastic), protective coatings, protective tapes, anodic protection and cathodic protection. The information requested in (b) and (c) are not relevant to the formation of Mr. Cavallo's opinions, so he did not conduct research into these areas.

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